1 THE HONORABLE BENJAMIN H. SETTLE 2 3 4 5 6 UNTIED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 TACOMA DIVISION 9 INDUSTRIAL TRAINING 10 INTERNATIONAL LLC, 11 Plaintiff, 12 v. 13 **CRANE INSPECTION &** CERTIFICATION BUREAU, LLC, 14 15 Defendant. **January 17, 2024** 16 17 18 19 20 "Complaint") and would respectfully show as follows: 21 1. 22 31, 2024. 23 2. 24 25 Complaint. 26 27 STIPULATED MOTION AND 28 ORDER FOR EXTENSION OF -1-

Case No. 3:23-cv-05674-BHS

STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT

NOTE ON MOTION CALENDAR:

Without submitting to the jurisdiction of this Court, Defendant Crane Inspection & Certification Bureau, LLC ("CICB") files this Stipulated Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff Industrial Training International LLC's ("ITI") Complaint (the

- CICB's current deadline to answer or otherwise respond to the Complaint is January
- The parties are engaged in settlement negotiations and have therefore stipulated that CICB shall have up to and including March 29, 2024 to answer or otherwise respond to the

[CASE No. 3:23-cv-05674-BHS]

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- 3. Counsel for CICB has conferred with counsel for ITI with respect to the matters set forth in this motion. ITI has stipulated to the requested extension.
- 4. This request for extension of time to answer or otherwise respond is not for delay but for good cause and so that justice may be served. Specifically, CICB needs additional time to, among other things, analyze ITI's claims, continue settlement negotiations, and determine how to plead or otherwise respond.
- 5. This motion shall not constitute a waiver of any objection, claim, or defense regarding venue, jurisdiction, or otherwise that CICB may raise when answering or otherwise responding to the Complaint.

Accordingly, CICB, without submitting to the jurisdiction of this Court, respectfully requests that this Court grant this motion and allow CICB up to and including March 29, 2024 to answer or otherwise respond to the Complaint.

RESPECTFULLY SUBMITTED.

Dated: January 17, 2024

BRACEWELL LLP

/s/ Jeffrey E. Danley

Jeffrey E. Danley, WSBA No. 52747 701 Fifth Avenue, Suite 3420 Seattle, WA 98104

Telephone: (206) 204-6200 Facsimile: (800) 404-3970 jeff.danley@bracewell.com

-and

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Jonathon K. Hance (pro hac vice)
Texas Bar No. 24065364
L. Andrew Taggart (pro hac vice)
Texas Bar No. 24093238
711 Louisiana St., Suite 2300
Houston, TX 77002
Telephone: (713) 223-2300
Facsimile: (800) 404-3970
ionathon hance@bracewell.com

Facsimile: (800) 404-3970 jonathon.hance@bracewell.com drew.taggart@bracewell.com

STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME [CASE No. 3:23-cv-05674-BHS]

Bracewell LLP 701 5th Avenue, Suite 3420 Seattle, WA 98104 206-204-6200 (t)

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3		-and		
4			C I.I.D.	
			AW GROUP LLP	
5		<u>/s/<i>Marc C</i></u> Marc C. L	. Levy evy, WSBA No. 19203	
6		701 Fifth Seattle, W	Avenue, Suite 5400	
7		Telephone	e: (206) 622-4900	
8			eedip.com	
9		ATTORN	EY FOR PLAINTIFF	
10		INDUSTF	INDUSTRIAL TRAINING INTERNATIONAL LLC	
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28	ORDER FOR EXTENSION OF TIME [CASE No. 3:23-cv-05674-BHS]	-3-	701 5th Avenue, Suite 3420 Seattle, WA 98104 206-204-6200 (t)	

ORDER The Court has reviewed the parties' Stipulated Motion and finds it should be granted. It is therefore ORDERED that Defendant Crane Inspection & Certification Bureau, LLC's time to answer or otherwise respond to the complaint is extended up to and including March 29, 2024. DATED this 17th day of January, 2024. THE HONORABLE BENJAMIN H. SETTLE UNITED STATES DISTRICT JUDGE